

EXHIBIT A



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April 22, 2015

BY E-MAIL

Denise Alvarez, Esq.
Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153

Re: *In re Lehman Brothers Holdings Inc.*
Case No. 08-13555 (SCC)
Claim No. 67707 Filed By Spanish Broadcasting System, Inc.

Dear Ms. Alvarez:

This letter summarizes the status of the discovery issues that were discussed during today's "meet and confer" (the "Meet and Confer") between Lehman and Spanish Broadcasting. We believe that the parties' discussions during the Meet and Confer were productive and we look forward to further discussions with you concerning the discovery issues that remain outstanding.

Search Terms

As discussed during the Meet and Confer and in our written correspondence, the searches of Spanish Broadcasting's electronically stored information ("ESI") have retrieved an unduly burdensome number of documents. The complete set of documents, after removing duplicative documents, totals more than **650,000**. The agreed upon search term (the "Largest Term") that retrieved the largest number of documents (*i.e.*, 383,340 documents) is the following:

((("financ*" OR "operat*" OR "valu*" OR "worth" OR "viability"
OR "viable" OR "condition" OR "liquid*") w/25 ("Spanish
Broadcasting" OR "SBS" OR "SBSA"))

Our sampling of documents retrieved by the Largest Term has revealed numerous problems with the term, including, without limitation, that the Largest Term retrieves irrelevant and/or non-responsive documents that contain (a) generic language describing Spanish Broadcasting as a company that "operates" radio stations; and (b) e-mail signature blocks that include job descriptions such as "Director of Operations." Indeed, our sampling indicates that 80% of the documents retrieved by the Largest Term are non-responsive.

: Chicago	: Los Angeles	: Shanghai
: Frankfurt	: New York	: Washington, DC
: London	: Palo Alto	: West Palm Beach

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Denise Alvarez, Esq.

2

April 22, 2015

We have worked with Spanish Broadcasting's outside vendor to refine the Largest Term. Based on our discussions with the vendor, we propose modifying the Largest Term by running the following two-step search (the "Modified Search") in its place:

Modified Search Step 1: The vendor will first search the agreed upon Spanish Broadcasting custodians' ESI using the term:

((financ* AND NOT ("financial officer" or "finance coordinator" or "finance counsel")) OR (operation* AND NOT ("president of operations" or "director of operations" or "consolidated operations" or "operations manager")) OR (valu* AND NOT evalu*) OR worth OR viability OR viable OR condition OR liquid*)

Modified Search Step 2: The vendor will then search only the documents retrieved in Step 1 using the term:

((financ* OR operation* OR valu* OR worth OR viability OR viable OR condition OR liquid*) w/5 ("Spanish Broadcasting" OR SBS OR SBSA))

Our sampling of the documents retrieved by the two-step Modified Search indicates that even the Modified Search still retrieves nearly 40% non-responsive documents, but we do consider this to be an improvement. Please let us know whether Lehman agrees to modify the Largest Term by replacing it with the Modified Search.

We are continuing to work with the vendor to see if there is a way to narrow the other Problematic Search Terms identified in our letters of April 3, 2015 and April 10, 2015. In the absence of an agreement to narrow those Problematic Search Terms, Spanish Broadcasting will be required to review an enormous volume of documents.

Claims Litigation Schedule

As discussed during the Meet and Confer, a reasonable extension of the deadlines set forth in the Second Amended Claims Litigation Schedule [Dkt No 48418] is necessary for Spanish Broadcasting to complete its production of documents. As of today, Spanish Broadcasting has produced 595,503 pages of documents. Spanish Broadcasting has obviously proceeded in good faith with its document production to the extent feasible, notwithstanding the open issues with respect to the Problematic Search Terms. Given the volume of documents that have been retrieved by the Problematic Search Terms, Spanish Broadcasting's best estimate is that it will need an additional six weeks from Monday, April 27, 2015 (*i.e.*, until June 8, 2015) to complete its production. The other dates in the Second Amended Claims Litigation Schedule should be pushed back to correspond.

Spanish Broadcasting has reviewed the factual history concerning discovery in this matter. That history demonstrates that Lehman caused a six week delay in the parties reaching agreement on search terms. More specifically, Spanish Broadcasting provided Lehman with a proposed list of search terms for Spanish Broadcasting's ESI on January 20, 2015. On February 3, 2015, Lehman rejected Spanish Broadcasting's proposal and provided Spanish Broadcasting with its own list of proposed search terms. On February 20, 2015, the Court entered the Second

Denise Alvarez, Esq.

3

April 22, 2015

Amended Claims Litigation Schedule. Days later, during a meet and confer on February 25, 2015, Lehman informed Spanish Broadcasting that it would send a revised list of proposed search terms, which Lehman provided in a letter of March 3, 2015. On March 5, 2015, Spanish Broadcasting agreed to run all of the terms that Lehman proposed in its March 3 letter. In light of the six week delay caused by Lehman in reaching agreement on search terms, a six week extension of the discovery deadlines is both reasonable and necessary.

SBS Request No. 29

We appreciate Lehman's proposal regarding SBS Request No. 29 that you described during the Meet and Confer. We ask that you send us the proposal in writing, so that we may confer with our client regarding the proposal.

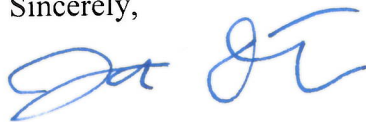
In addition, Spanish Broadcasting stands by its position that Lehman should run a search of the agreed upon custodians' ESI for documents responsive to SBS Request No. 29. More particularly, Spanish Broadcasting proposes that Lehman run the following search term for the period from September 15, 2008 through November 7, 2014:

("Swap" OR "ISDA") w/10 ("replace*" OR "alternate*")

As discussed during the Meet and Confer, Lehman has no basis to assert that this search will not retrieve relevant or responsive documents until Lehman has, at a minimum, run the search term and sampled the documents retrieved by the term. Spanish Broadcasting requests that Lehman run the search term promptly.

We are available for a further call on Thursday, April 23 or Friday, April 24. We look forward to hearing from you.

Sincerely,



Joseph Otchin

cc: Ralph Miller, Esq. (via e-mail)
Jacqueline Marcus, Esq. (via e-mail)
Alexander Woolverton, Esq. (via e-mail)
Madlyn Gleich Primoff, Esq.